

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

MARJORIE FERRELL, et al.,
Plaintiffs,
v.

Civil Action No. C-1-01-447

Judge Sandra S. Beckwith

WYETH – AYERST LABORATORIES, INC.,
et al.,
Defendants

Magistrate Judge Timothy S. Hogan

AFFIDAVIT OF SUZANNE STONE

STATE OF OHIO)
) ss.:
COUNTY OF HAMILTON)

Suzanne Stone, being first duly sworn, deposes and says:

1. I am the Vice President, Finance and Administration, for the Society for Women's Health Research ("SWHR"). I submit this affidavit in support of my organization's request for an award of a cy pres distribution resulting from the settlement of this litigation.


2. SWHR is the nation's only non-profit organization whose mission is to improve the health of women through research, education and advocacy. Founded in 1990, SWHR has brought to national attention the need for appropriate inclusion of women in major medical research studies and the need for more information about conditions affecting women in major medical research studies and the need for more information about conditions affecting women exclusively, predominately or differently than men. SWHR advocates increased funding for research in women's health;

encourages the study of sex differences that may affect the prevention, diagnosis and treatment of disease; promotes the inclusion of women in medical research studies; and, informs women, providers, policy makers and media about contemporary health issues.

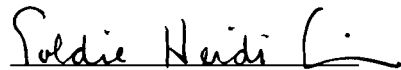
3. SWHR has made a difference in women's health. Since its inception; (a) SWHR has fought for and won the inclusion of mandates in the National Institutes of Health Revitalization Act of 1993, requiring that federal agency to appropriately include women in its clinical research trials and authorizing the Office of Women's Health Research; (b) Pressured the Food and Drug Administration to further strengthen rules on including women in clinical trials and influenced Congress to provide funding for a database on women's health issues, such as ensuring appropriate inclusion and review of research data by sex; (c) Co-sponsored the Institute of Medicine report, "Exploring the Biological Contributions to Human Health: Does Sex Matter?"; and (d) won substantial and steady increases in federal funding for sex-based medical and scientific research.

4. SWHR currently uses funds to accomplish the following purposes and goals: (a) Advocacy- SWHR is working to provide women with a strong voice in the federal government by supporting the permanent authorization of women's health offices at agencies such as the Department of Health and Human Services, the FDA, and the Centers for Disease Control and Prevention; (b) Scientific Programs- SWHR awards grants through its Isis Fund for Sex based Biological Research. The awards support interdisciplinary and collaborative research projects on treatment for post partum depression and the role sex plays in drug addiction; and, (c) Public Education and Communications- SWHR, its board members and staff serve as frequent media experts providing interviews that continually raise awareness of important women's health

research issues. In addition, SWHR, sponsors periodic media roundtables and public advocate campaigns on current women's health issues.


Suzanne Stone

Sworn to before me this
29th day of May, 2007.


Notary Public

My Commission Expires January 1, 2012